



CAPEZZA HILL, LLP
ATTORNEYS AT LAW

Benjamin W. Hill, Esq.

Partner

February 6, 2020

Via Hand Delivery
Confidential and Filed Under Seal

Hon. Christian Hummel
James T. Foley Courthouse
445 Broadway
Albany, NY 12207

Re: *Special Master Request for Payment of Fees* (1:18-cv-566)

Dear Your Honor:


Enclosed for your review is an invoice for services rendered through January 31, 2020 in the above-captioned matter which is being submitted to you under seal per the Court's instruction.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

CAPEZZA HILL, PLLC

By:


Benjamin W. Hill

Encs.

Capezza Hill, LLP
 30 South Pearl Street
 P-110
 Albany, NY 12207
 United States
 518-478-6065



Hon. Christian Hummell

Balance \$15,179.00
Invoice # 00036
Invoice Date February 6, 2020
Payment Terms
Due Date

Special Master NRA v. Cuomo et al.

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
12/03/2019	BH	Review/Analysis	Research and review doc review platforms/options	\$325.00	1.5	\$487.50
12/09/2019	BH	Review/Analysis	Review/analysis of Hummell 8.8.19 Order	\$325.00	1.2	\$390.00
12/09/2019	BH	Review/Analysis	Review docket and text orders.	\$325.00	0.2	\$65.00
12/19/2019	BH	Review	Review letter from Brewer to Court re special master contact	\$325.00	0.2	\$65.00
12/19/2019	BH	Phone Call	Call w/ Nicole at Hummell's chambers re status.	\$325.00	0.2	\$65.00
01/08/2020	BH	Draft	Research and draft memo re deliberate process privilege	\$325.00	1.0	\$325.00
01/09/2020	BH	Review/Analysis	Review docket and pleadings	\$325.00	1.0	\$325.00
01/09/2020	BH	Draft	Draft memo on privileges	\$325.00	1.0	\$325.00
01/09/2020	BH	Draft	Draft spreadsheet	\$325.00	0.4	\$130.00
01/09/2020	BH	Review/Analysis	Review text order re special master	\$325.00	0.1	\$32.50
01/09/2020	BH	Research	Research privilege issues	\$325.00	0.3	\$97.50
01/09/2020	BH	Review/Analysis	Review Scheindlin article re sp masters	\$325.00	0.2	\$65.00
01/10/2020	BH	Review/Analysis	Review of Amended Complaint and exhibits; memos re same.	\$325.00	2.3	\$747.50
01/12/2020	BH	Review/Analysis	Review and analyze transcript of mtd oral argument	\$325.00	1.0	\$325.00
01/13/2020	BH	Review/Analysis	Review and analysis of Order on first MTD Amended Complaint	\$325.00	2.0	\$650.00
01/13/2020	BH	Review/Analysis	Review and analysis of Order on Second MTD re selective enforcement claims etc.	\$325.00	0.5	\$162.50
01/13/2020	BH	Review/Analysis	Review and analysis of motion to compel and response	\$325.00	2.6	\$845.00

01/14/2020	BH	Review/Analysis	Review and analysis of motions to compel and for protective order	\$325.00	1.8	\$585.00
01/14/2020	BH	Review/Analysis	Review and analyze courts decision on vullo deposition	\$325.00	0.3	\$97.50
01/14/2020	BH	Review/Analysis	Review letter briefs re motion to amend	\$325.00	0.2	\$65.00
01/15/2020	BH	Review/Analysis	Review motion to file second amended complaint.	\$325.00	0.3	\$97.50
01/15/2020	BH	Correspondence	review letter from William Scott re special master.	\$325.00	0.1	\$32.50
01/16/2020	BH	Review/Analysis	Review caselaw -- children's first etc. re privileges.	\$325.00	1.4	\$455.00
01/16/2020	BH	Document Review	Doc Review of Gov docs	\$325.00	0.7	\$227.50
01/17/2020	BH	Review/Analysis	Document review gov's docs.	\$325.00	4.5	\$1,462.50
01/17/2020	BH	Review	Review exec chamber docs.	\$325.00	3.0	\$975.00
01/17/2020	BH	Phone Call	Phone call w/ Nicole in chambers re log, etc.	\$325.00	0.3	\$97.50
01/18/2020	BH	Review/Analysis	Research on privilege log; memo re prep for conf w/ judge.	\$325.00	1.0	\$325.00
01/21/2020	BH	Review/Analysis	Review CFF priv log	\$325.00	0.2	\$65.00
01/21/2020	BH	Review/Analysis	Review and analysis of Motion to compel subpoena papers	\$325.00	1.2	\$390.00
01/21/2020	BH	Research	Research on priv logs and privilege.	\$325.00	0.7	\$227.50
01/21/2020	BH	Research	Review and analysis of caselaw on atty-client privilege and deliberative process privilege	\$325.00	1.5	\$487.50
01/23/2020	BH	Review/Analysis	Review DFS docs	\$325.00	2.0	\$650.00
01/23/2020	BH	Phone Call	Prep for and call with chambers re privilege log, etc.	\$325.00	0.6	\$195.00
01/23/2020	BH	Phone Call	Call w/ chambers re conf.	\$325.00	0.1	\$32.50
01/23/2020	BH	Review/Analysis	Review corr and analysis of prior orders, draft letter to Judge Hummel	\$325.00	2.5	\$812.50
01/23/2020	BH	Review/Analysis	Review DFS docs and priv log	\$325.00	1.0	\$325.00
01/27/2020	BH	Review/Analysis	Review caselaw and orders re affidavit and privilege logs	\$325.00	3.5	\$1,137.50
01/27/2020	BH	Phone Call	Phone call w/ chambers re priviledge logs	\$325.00	0.3	\$97.50
01/28/2020	BH	Draft	Review logs and documents, corr.	\$325.00	2.5	\$812.50
01/28/2020	BH	Edit	Edit letter to Court re status etc.	\$325.00	0.5	\$162.50

Totals: **45.9 \$14,917.50**

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
01/09/2020	BH	Copies	copies of pleadings	\$0.25	90.0	\$22.50
01/09/2020	BH	Copies	Copies of ECF docs oral argument tr.	\$0.25	50.0	\$12.50
01/09/2020	BH	Copies	Decision on MTD	\$0.25	71.0	\$17.75
01/13/2020	BH	Bulk Copying	Motions, pleadings, orders	\$0.25	389.0	\$97.25
01/17/2020	BH	Copies	gov documents	\$0.25	337.0	\$84.25
01/21/2020	BH	Copies	Copies of motion to compel subpoena papers	\$0.25	47.0	\$11.75

01/21/2020	BH	Copies	Westlaw sections on privilege	\$0.25	62.0	\$15.50
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Expense Total: **\$261.50**

Time Entry Sub-Total:	\$14,917.50
Expense Sub-Total:	\$261.50
Sub-Total:	\$15,179.00
Total:	\$15,179.00
Amount Paid:	\$0.00
Balance Due:	\$15,179.00